



{In Archive} Re: Fw: 261.65(c)(1)(iv) 

Molly Finn to: Cheryl Jamieson

Cc: Amy Hensley

04/28/2011 08:58 AM

From: Molly Finn/DC/USEPA/US
To: Cheryl Jamieson/R3/USEPA/US@EPA
Cc: Amy Hensley/DC/USEPA/US@EPA
Archive: This message is being viewed in an archive.

Cheryl, I'm very sorry for such a late response, but in case this is still a question you have, I agree with Peter - it isn't limited to generators. Another handler could theoretically store the PCBs within that initial 30 days, although I would think it is typically the generator that makes use of this provision. I have gone through all of the previous interpretive letters I could find, and found nothing that speaks to this specifically.

Please let me know if you have any further questions.

Thanks,

Molly

Molly Finn
Environmental Engineer
Cleanup Programs Branch
Office of Resource Conservation and Recovery
U.S. EPA
703-347-8785

Cheryl Jamieson

Molly, Please let me know your thoughts on this....

03/07/2011 03:38:41 PM

From: Cheryl Jamieson/R3/USEPA/US
To: Molly Finn/DC/USEPA/US@EPA
Date: 03/07/2011 03:38 PM
Subject: Fw: 261.65(c)(1)(iv)

Molly, Please let me know your thoughts on this. Thanks,
Cheryl Lynn Jamieson

----- Forwarded by Cheryl Jamieson/R3/USEPA/US on 03/07/2011 03:37 PM -----

From: Peter Gimlin/DC/USEPA/US
To: Cheryl Jamieson/R3/USEPA/US@EPA
Cc: Molly Finn/DC/USEPA/US@EPA
Date: 12/09/2010 09:30 AM
Subject: Re: 261.65(c)(1)(iv)

I don't recall us limiting this to generators, although I think that was the intent of restricting it to 30 days from the date of the initial designation for **disposal**. I suppose if another handler was storing the stuff within this initial 30 day timeframe they could make use of it. They do not get another 30 days for themselves upon receipt of the waste from the generator. This is only good for the first 30 days of the one year **disposal** clock.

ORCR is now in charge of **disposal** issues, so I'm passing this along to Molly Finn. Her call on the policy would be the definitive one. Perhaps we have already issued an interpretive letter or the like.

Cheryl Jamieson

Peter: I have a "new" case with a large compan...

12/09/2010 08:49:09 AM

From: Cheryl Jamieson/R3/USEPA/US
To: Peter Gimlin/DC/USEPA/US@EPA
Date: 12/09/2010 08:49 AM
Subject: 261.65(c)(1)(iv)

Peter: I have a "new" case with a large company and was examining the provision for 30 day temporary storage of liquid PCBs at 761.65(c)(1)(iv). Kelly B. seemed to think that this provision applies only to generators. I looked at the q and a's marked Jan. 2009 and did not find a reference to this section. Maybe I missed something but are you aware as to whether only generators can avail themselves of this provision? thanks, Cheryl Jamieson